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Dockets Management Branch (HFA-305) U.S. Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852

ATTENTION: Docket #98N-1038, Irradiation in the Production, Processing, and Handling of Food, July 19, 1999

Comments on accurate irradiated food labeling. The FDA needs to require irradiated food labeling that:

- 1) Clearly displays labels for easy view
- 2) Uses easy-to-understand wording on label
- 3) Uses terms like "irradiation" or "irradiated"
- 4) Uses the radura symbol
- 5) Permanently requires labeling on all irradiated foods

I oppose the following alternative words on irradiated food labels as they're misleading and should not be used: Cold Pasteurization & Electronic Pasteurization. A weak irradiation label on such foods is also misleading because irradiation destroys vitamins and nutrients in foods. Radiolytic toxins occur in irradiated foods – formaldehyde, benzene, and others – that are harmful to human health. There's been inadequate safety testing of the biological effects of irradiation on food by radiolytic products & free radical toxins. Irradiation causes other changes in spoilage qualities that are not obvious or expected.

Sincerely,

Paul A. McCutchen

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